

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Federal Insurance Co. v. al Qaida, 03 CV 06978 (RCC)

**PLAINTIFFS' SUPPLEMENTAL PLEADING IDENTIFYING
ADDITIONAL PLAINTIFFS PURSUANT TO F.R.C.P. 15(d)
AND PARAGRAPH 12 OF CASE MANAGEMENT ORDER NO. 2**

The above-captioned plaintiffs, by and through their attorneys, Cozen O'Connor, hereby supplement their First Amended Complaint identifying additional plaintiff pursuant to Federal Rule of Civil Procedure 15(d) and Paragraph 12 of Case Management Order No. 2, and do hereby allege the following:

1. Additional plaintiff, Transatlantic Reinsurance Company, is a New York Corporation organized and domiciled under the laws of New York. At all times material hereto, additional plaintiff, Transatlantic Reinsurance Company, was in the business of issuing policies of insurance.

2. At the time of the September 11th Attack, additional plaintiff, Transatlantic Reinsurance Company provided reinsurance coverage to the insurance companies, reinsurance companies, corporations and entities identified in Exhibit KKKK hereto (the "Cedants") relative to primary policies of insurance issued to their respective Insureds, which primary policies provided insurance coverage for property and/or business interests which sustained damage as a

result of the September 11th Attack. In accordance with the terms of the applicable policies of reinsurance, additional plaintiff, Transatlantic Reinsurance Company, has made payments to its Cedents identified in Exhibit KKKK hereto, which is expressly incorporated by reference, and expects that it may make additional payments in the future relation to claims arising from the September 11th Attack. By virtue to its payments to its Cedents and corresponding payments to the Insureds of the Cedents, and pursuant to the terms and conditions of the subject insurance policies and legal and equitable principles, additional plaintiff, Transatlantic Reinsurance Company, is subrogated to the rights of recovery of its Cedents and their aforesaid insureds against any responsible third parties.

Respectfully submitted,

COZEN O'CONNOR

By: _____/s/
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**THE EXHIBITS APPENDED TO PLAINTIFFS' SUPPLEMENTAL PLEADING
HAVE BEEN FILED UNDER SEAL PURSUANT TO AN ORDER ISSUED BY
THE HONORABLE RICHARD C. CASEY ON SEPTEMBER 9, 2004.**

**JUDGE CASEY, WHO IS PRESIDING OVER THE RELATED CASES
COMPRISING THE MULTIDISTRICT LITIGATION PENDING UNDER DOCKET
NUMBER 03 MDL 1570, GRANTED COZEN O'CONNOR'S WRITTEN
APPLICATION TO FILE UNDER SEAL THE INSURANCE SCHEDULES FOR THE
FEDERAL PLAINTIFFS.**